

October 16, 2006

455 Capitol Mall

Suite 330

Sacramento

California

95814-4405

Jane Taylor
Associate Architect
California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, CA. 95833

Dear Ms. Taylor:

The California Assisted Living Association (CALA), representing more than 400 assisted living communities (RCFEs) throughout the state, has concerns with the proposed building standards.

First, we are disturbed by the lack of inclusion in a process that would result in significant changes to the residential and senior care profession. Such a comprehensive overhaul of California's building standards should include involvement by those impacted by the changes at an early stage.

CALA's second and primary concern relates specifically to the adoption of good public policy. Reclassifying residential care facilities for the elderly from the residential R2.1 group to the institutional I-1 group is contrary to the policy direction California is taking in all other areas. Reclassifying a residential environment as an institution is contrary to the spirit of the US Supreme Court decision in *Olmstead v. L.C.* This would be a step backward for California, when instead, other states should follow our lead in promoting the residential model rather than the institutional setting. Even something as simple as a name change without immediate standard changes, sets a new regulatory mindset that will likely create problems in the future. We urge the Building Standards Commission to reject this backward step.

Sincerely,



Heather S. Harrison
Vice President of Public Policy

**The Voice of
Assisted
Living**

cc: Dave Walls, Executive Director, Building Standards Commission
Erin O'Keefe, Lehman Kelly Sadler & O'Keefe